Summary of modifications to ACSA guiding document

2010

- Cover, changed the document name: removed “Implementation” since the program has been implemented.

- Cover, latest revision date on the bottom

- Table of Contents, revised reflecting modifications

- Pages 1-2, Points of contact updated: Due to rotation at the Marine Safety Detachments the main number for scheduling inspections has been listed vs. one particular POC.

- Page 9, Applicability checklist for classed and load lined vessels that do not need exemption: added Certificate of Class and Load line Certificate to list of documents needed for fish processing vessels that do not need exemption under ACSA

- Page 9, Deleted paragraph regarding compliance date of 1 Jan 2008.

- Page 10, New wording. "A vessel built or converted for use as a fish processing vessel after January 1, 2006, which produces one or more of the products identified as "Beyond Minimal Processing" in Annex 1, must be classed and loadlined as required by existing laws and regulations. On a case by case basis, an owner may apply for an exemption from class and loadline in accordance with 46 CFR 28.60 and 46 USC 5108 (a)(1). Exemptions are not automatic. Vessel owners requesting an exemption may not produce those products until such time as the exemption has been granted (if granted at all) and the vessel is in full compliance with the conditions of the exemption”.

- Page 13, Section A – Administration
    - Administrative tasks were divided according to role (Coast Guard, vessel owner/operator, third party examiners)
    - New wording for Coast Guard District 13 and District 17 roles & responsibilities. Small changes to wording for Sectors.
    - Added Role of ACSA Vessel Owners and Operators.
    - Added Pre-Inspection preparations.
    - Clarification on the four ACSA Inspection types (as printed in the ACSA Newsletter)

- Section C, Ground Tackle, changed reference to ABS Rules for building and classing steel vessels under 90 meters Part 2 Chapter 2. Added "operational test of windlass" to inspection checklist. Installed anchoring systems that do not meet the ABS standard are acceptable (grandfathered) until they no longer function or have deteriorated beyond the limit. When a grandfathered anchoring system is replaced rather than just repaired, the new anchoring system must meet ABS standards.

- Section H - Life Saving. Incorporated life raft approval standard 160.151, already found on most ACSA vessels, these rafts provide greater protection and survivability when vessels operate in harsh and cold conditions. This is due to superior design, construction and testing.

- Annex 5, added sample ACSA Exemption Letter

2009

The following is a summary of changes that were recommended and discussed at the 30 Jun 2009 ACSA meeting. The changes were finalized and published in the ACSA Implementation Guide Aug 2009.

- References were updated throughout the document

- The cover shows latest revision date on the bottom

- Table of Contents revised reflecting changes

- Pages 1-2, Points of contact: Mr. Troy Rentz added as ACSA Program Coordinator. Mr. Ed Minor added as Sector Anchorage ACSA Inspector.

- Page 11, Added Hull Exams and Expiration of Exemption Letters are "drop dead dates". They may be completed prior to the due date but may not exceed the due date/expiration date.

- Page 11, Procedure for requesting an exemption letter: Removed requirements that were not part of the original agreement.

- Page 12, Revocation of an exemption letter: Inserted procedure for appeals.

- Page 14, "ACSA Inspection Requirements" Clarifies that both ACSA and COC exams are to be completed on an annual basis for vessels enrolled in the program.

  Page 14, Future exemption letters issued under the ACSA program will have endorsement blocks endorsed by the USCG representative when annual

examinations are completed.

- Page 15, Modifications to the ACSA Examination Standards: New paragraphs state that ACSA stakeholders will be provided notice on proposed changes to ACSA examination Standards and will have 30-60 days (depending on urgency) to provide feedback.

- Page 17, Administration checklist was added.

- Pages 18-20, processing space sump pumps: deleted language requiring sump pumps on each side of the vessel capable of dewatering at "twice" the rate of water introduced into the factory space. Now "at" the rate of water introduced into the factory space.

  The operator of a vessel with unique arrangements that meet the intent of this requirement and provide an equivalent level of safety should include an explanation in their request for an exemption under 46 CFR 28.60".

- Page 22 checklist: ground tackle inspection interval changed from twice in 5 years to every 5 years. Ground tackle references are used only for purposes of sizing and arrangement.

- Page 28 Rudder and Rudder Shaft Examinations: A paragraph was added to address special considerations for Kort Nozzles and Z drives.

- Page 29, Hull audio gauging for bottom plate changed to read "at least two shots on each bottom plate at the discretion of the attending Marine Inspector". Previously read "all bottom plating".

- Pages 35-37, Machinery Systems: deleted wording for a maintenance schedules checklist under machinery maintenance in favor of language from the original ACSA agreement, Preventive Maintenance Program.

- Diesel propulsion machinery tests: Changed automatic shutdown on over speed to automatic shutdown on over speed (<u>if installed</u>).

- Moved Fire Hazard Survey and A-Class Bulkheads to "fixed fire fighting equipment & arrangements" (page 39).

- Page 40 checklist, fixed fire fighting equipment & arrangements: revised language for A-0 fire boundaries and non-combustible insulation.

- Page 41 Clarified fixed gas fire extinguishing system is required for spaces containing main "and auxiliary" internal combustion engine(s) of more than 50 horsepower.

- Pages 43-44, Fire Hazard Surveys and A-0 Boundaries, new additional guidance added:

Fire Hazard Surveys

Machinery spaces and escape scuttles shall be maintained in reasonable state of cleanliness to reduce the risk of fire. Flammable materials shall not be stored within machinery spaces or in escape scuttles. Scheduled inspections shall include a survey in all machinery spaces and other spaces where flammable and combustible materials are stored and used. At each annual inspection, the Coast Guard, accepted organizations, or an accredited marine surveyor of an approved 3rd party organization and the vessel representative shall conduct a fire safety hazard survey of the engine spaces to identify and remedy any additional fire safety hazards which may exist, but are not specifically identified in the ACSA Program.

Notwithstanding the need for crew to conduct normal operations, special attention shall be given to maintaining adequate egress paths from all compartments.

A-0 Boundaries

Since machinery spaces are a common source of fire aboard vessels, it is standard practice to design machinery space bulkheads to prevent the passage of smoke and flame. This contains fires that may start within these spaces and allows time for fixed extinguishing systems to be activated or other fire fighting efforts. The longer a vessel has been in service, the more likely that bulkheads isolating machinery spaces have been breached. These breaches allow fire and smoke to spread to other compartments and impair the effectiveness of fixed extinguishing agents.

A-0 bulkheads or decks must be composed of steel or equivalent material, suitably stiffened and made intact with the main structure of the vessel, such as the shell, structural bulkheads, and decks. They must be so constructed that, if subjected to the standard fire test, they are capable of preventing the passage of smoke and flame
for 1 hour. It is the intent of this requirement to assure there is an intact steel bulkhead in all machinery spaces while recognizing that many ACSA vessels have bulkheads in machinery spaces that have polyurethane foam insulation on the opposite side of the bulkheads. Engine rooms and cargo holds share common bulkheads in standard ACSA vessel configurations.

Accepted methods of passing cables and piping through machinery space decks and bulkheads are often not used in an effort to save time and money or because conditions during repair do not permit proper penetrations to be used. The risk posed by these unsafe penetrations shall be reduced at the earliest opportunity. Marine inspectors shall ensure that machinery space bulkheads and decks remain intact at each penetration. Penetrations that are discovered non-tight shall be required to be repaired within a reasonable time.

All closures and vents in A-0 boundaries shall be constructed of steel or equivalent material. All closures and vents shall be capable of being secured manually from outside the space.

- Page 43, Carbon dioxide detectors were expensive and hard to find approved type. Added language that the OCMI may accept an oxygen level detector as an alternative
.
- Page 46, Freon Detectors are only required when Freon is used in freezer hold systems and will not be required when Freon is used in small applications such as, commercial refrigerators and air conditioners.

- Page 45, Firefighting Equipment: Added each SCBA must be "positive pressure".

- Annex 1, Product Codes: deleted "& tail removed" from description of product code 8

- Annex 4, removed clarification message dated 20 Dec 2008 . This is a historical document. Much of the information from the message was incorporated into the Implementation Guide.

- Annex 5 is now Annex 4, Sample Renewal Request Letter: Removed additional language that was not part of the original agreement.